

EXHIBIT 276

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

-----X
STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

Civil Action No.

vs.

1:14-cv-14176-ADB

PRESIDENT AND FELLOWS OF HARVARD COLLEGE,
(HARVARD CORPORATION),
Defendant.

-----X
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Deposition of

████████████████████
July 12, 2017

9:10 a.m.

Taken at:

████████████████████
██
██

Wendy L. Klauss, RPR

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1 A. Yes.

2 Q. Did you see it before your
3 deposition preparation?

4 A. Yes.

5 Q. When did you see it?

6 A. When I signed it on May 27, 2017.

7 Q. Is that your signature on the
8 second page?

9 A. Yes.

10 Q. I'm sorry, I should have done this.
11 I'll note for the record that this is a
12 document titled the Declaration of [REDACTED]

13 [REDACTED]

14 MR. PARK: That's the second page.

15 MS. MOONEY: I'm sorry. 1999 to
16 2000. Sorry about that.

17 Q. Did you write this document?

18 MR. PARK: Objection. You can
19 answer.

20 A. No.

21 Q. Do you know who wrote it?

22 A. No.

23 Q. Did counsel provide this document
24 for you to sign?

25 A. Counsel, as in --

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1 Q. Did Mr. Park or one of his
2 colleagues at Consovoy McCarthy & Park or from
3 Burns & Levinson provided this document for you
4 to sign?

5 MR. PARK: Objection.

6 A. I can't recall exactly who gave me
7 the document to sign, but, yeah.

8 Q. It was one of SFFA's lawyers who
9 gave you the document to sign?

10 A. I believe so.

11 Q. Did you review the document before
12 signed it?

13 A. Yes.

14 Q. Did you make any changes to the
15 document before you signed it?

16 A. No.

17 Q. Sitting here today, is everything
18 in this declaration true and accurate?

19 MR. PARK: Objection.

20 A. Yes, as far as I see.

21 Q. Could you please read paragraph 6
22 for me.

23 A. "I am able and ready to apply to
24 transfer to Harvard were it to cease the use of
25 race or ethnicity as an admissions preference

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1 and to cease its intentional discrimination
2 against Asian Americans."

3 Q. Thank you. Was this statement
4 accurate when you signed the declaration?

5 A. Yes.

6 Q. Is it still true?

7 A. Yes.

8 Q. The statement says that you are
9 ready to apply only if it ceases the use of
10 race or ethnicity as an admissions preference
11 and to cease its intentional discrimination
12 against Asian Americans, correct?

13 MR. PARK: Objection.

14 A. Correct.

15 Q. If Harvard does cease the use of
16 race or ethnicity as an admissions preference,
17 would you plan to apply to transfer?

18 MR. PARK: Objection.

19 A. As the document says, I'm able and
20 ready to apply to transfer, were it to cease
21 the use of race.

22 Q. If it doesn't cease the use of race
23 or ethnicity during your time at [REDACTED] in the
24 next four years, do you plan to apply to
25 transfer?

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1 MR. PARK: Objection.

2 A. I would definitely plan less so,
3 because it is a matter of worth at that point.
4 Only if I think that it is worth it, meaning if
5 I think my chances are at least feasible would
6 I consider to apply for a transfer, and that,
7 as the document says, were it to cease the use
8 of race or ethnicity, I think those chances
9 would be improved and it would be worth the
10 effort to apply for a transfer at that point.

11 Q. Do you think it will be worth it
12 even if you made friends at [REDACTED] and
13 enrolled in a course of study and gotten
14 comfortable at [REDACTED]

15 MR. PARK: Objection.

16 A. Again, highly speculative. Perhaps
17 at the time, but I would have to consider, I
18 would have to weigh my options at the time to
19 determine how they are.

20 Q. Would you read paragraph 7 for me.

21 A. "I became a member of Students For
22 Fair Admissions in April 2017 because I support
23 its mission and belief that Harvard College and
24 many other colleges and universities wrongly
25 discriminate against Asian Americans applicants